

**UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**In re: JAMES M. ANDERSEN,  
Debtor,**

§  
§  
§  
§

**Case No. 24-80232-H2-13**

**Chapter 13**

**NOTICE OF RULE 2004 EXAMINATION OF JAMES M. ANDERSEN, DEBTOR**

COMES NOW, P.C.F. PROPERTIES IN TX, LLC (“Creditor” and “Party-in-Interest”), by and through the undersigned Counsel of Record, and serves it Notice of Rule 2004 Examination on James M. Andersen, Debtor, and such examination under oath shall be conducted on September 9, 2024 at 1:00 p.m., at the Law Offices of Barry & Sewart, PLLC, 4151 Southwest Freeway, Suite 680, Houston, TX 77027. The examination will continue from day to day until completed. If the examinee receives this notice less than seven (7) days prior to the scheduled examination date (or less than 10 days if examination is taking place outside of Houston, TX), the examination will be rescheduled upon timely request to a mutually agreeable time.

The Rule 2004 Examination will be conducted pursuant to Bankruptcy Rule 2004 and will be taken before an officer authorized to record the testimony. The scope of the examination shall be as described in Bankruptcy Rule 2004.

Examinee, James M. Andersen, Debtor, is further ordered to bring to the examination all of the documents described on the attached schedule.

I certify that a true and correct copy of this notice was mailed on the 21<sup>st</sup> day of August, 2024, to all persons indicated below.

Respectfully submitted,

BARRY AND SEWART, PLLC

/s/ John V. Burger

John V. Burger

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the forgoing was served to all parties in interest listed below by electronic delivery as allowed by the Federal and Local Rules of Bankruptcy Procedure and the and on the attached sheet by first class United States mail, postage prepaid, on or before the August 21, 2024.

Tiffany Castro  
Chapter 13 Trustee  
9821 Katy Freeway, Suite 590  
Houston, TX 77024

James Allen  
256 Andover Dr.  
Doraville, GA 30360

Via Email: [edf@ch13hou.com](mailto:edf@ch13hou.com)

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Via Email: [jandersen.law@gmail.com](mailto:jandersen.law@gmail.com)

Elizabeth Thomas Self Represented  
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And via email at: [elizthomas234@gmail.com](mailto:elizthomas234@gmail.com) and [tethomas3@aol.com](mailto:tethomas3@aol.com)

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4548 NW 6<sup>th</sup> Ct.  
Ocala, FL 33475

/s/ John V. Burger  
John V. Burger

EXHIBIT A

DOCUMENTS TO BE PRODUCED

Pursuant to Bankruptcy Rule of Procedure 2004, Examinee, James M. Andersen, shall appear at the Rule 2004 Examination and produce the following documents:

1. A current copy of your Texas Driver's License
2. A current copy of your Social Security Number
3. All individual Form 1040 federal tax returns for the tax year 2023
4. All individual Form 1040 federal tax returns for the tax year 2022
5. All individual Form 1040 federal tax returns for the tax year 2021
6. All individual Form 1040 federal tax returns for the tax year 2020
7. All individual Form 1040 federal tax returns for the tax year 2019
8. All individual Form 1040 federal tax returns for the tax year 2018
9. All corporate Form 1120 federal tax returns for the tax year 2023
10. All corporate Form 1120 federal tax returns for the tax year 2022
11. All corporate Form 1120 federal tax returns for the tax year 2021
12. All corporate Form 1120 federal tax returns for the tax year 2020
13. All corporate Form 1120 federal tax returns for the tax year 2019
14. All corporate Form 1120 federal tax returns for the tax year 2018
15. All documents relating to Case No. 2020-35780, and styled *Elizabeth Thomas, et al v. PCF Properties in Texas, LLC (sic), et al*, and pending in the 80<sup>th</sup> District Court, Harris County, Texas.
16. All documents relating to Case No. 01-23-00331-CV, and styled *Elizabeth Thomas, et al v. PCF Properties in Texas, LLC (sic), et al*, and pending in the First District Court of Appeals, Houston, Texas
17. All contracts, legal engagement records or agreements between you and Elizabeth Thomas for the period of January 1, 2011, up to and including August 25, 2024.
18. All contracts, legal engagement records or agreements between you and Jasmine Jarbis for the period of January 1, 2011, up to and including August 25, 2024.
19. All contracts, legal engagement records or agreements between you and JaVaughn Muhamed for the period of January 1, 2011, up to and including August 25, 2024.
20. All contracts, legal engagement records or agreements between you and Shelby Spires for the period of January 1, 2011, up to and including August 25, 2024.

21. All documents relating to Case No. 23-34971-H5-13, and styled *In re Elizabeth Thomas, Debtor*, in the United States Bankruptcy Court for the Southern District of Texas, Houston Division.
22. All documents relating to Case No. 24-11375-mew-7, and styled *In re Allan Armando Haye, Debtor*, pending in the United States Bankruptcy Court for the Southern District of New York.
23. All documents relating to Adv. No. 24-08005, and styled *James Allen, et al v. PCF Properties in Texas, LLC, (sic), et al*, pending in the United States Bankruptcy Court for the Southern District of Texas, Galveston Division.
24. All documents relating to each and every creditor to whom you owe sum of money.
25. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Elizabeth Thomas for any and all legal work you or your law office has provided to her.
26. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Allan Haye for any and all legal work you or your law office has provided to him.
27. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Jasmine Jarbis for any and all legal work you or your law office has provided to her.
28. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Monique Moore for any and all legal work you or your law office has provided to her.
29. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Sarah Jarbis for any and all legal work you or your law office has provided to her.
30. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Omari Thomas for any and all legal work you or your law office has provided to him.
31. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Jerih Pitts for any and all legal work you or your law office has provided to him.
32. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of JaVaughn Mahomed for any and all legal work you or your law office has provided to him.
33. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Greg Spires for any and all legal work you or your law office has provided to her.

34. All documents relating to or evidencing legal fees paid to you or your law office by or on behalf of Shelvy Spires for any and all legal work you or your law office has provided to her.
35. All documents relating to any bank account(s), including but not limited to savings accounts, checking accounts, money market accounts, certificate(s) of deposit, or other financial accounts with any federally insured banking institution(s) under your control or subject to your control and/or dominion from January 1, 2018 through August 24, 2024.
36. All documents relating to any stock, share, or other trading or investment account(s), including individual retirement account(s), SEP account(s), in any public or private traded investment financial institution(s), under your control or subject to your control and/or dominion from January 1, 2018 through August 24, 2024.
37. All contracts, legal engagement records or agreements between you and Liberty Property Management LLC for the period of January 1, 2011, up to and including August 25, 2024.
38. All contracts, legal engagement records or agreements between you and PCF Investments Inc. for the period of January 1, 2011, up to and including August 25, 2024.